

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
EUGENIO SANTIAGO-MEJIAS, a/k/a "Tito,"	:	VIOLATIONS:
JOSE LUIS GUZMAN	:	18 U.S.C. § 371 (conspiracy to deal in
JAIRO CORREA-MEREJILDO,	:	firearms without a license - 1 count)
a/k/a "Cabeza"	:	18 U.S.C. § 922(a)(1)(A) (dealing in
	:	firearms without a license - 1 count)
	:	18 U.S.C. §§ 922(g)(1) and 924(e)
	:	(convicted felon in possession of a firearm
	:	- 11 counts)
	::	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, defendants **EUGENIO SANTIAGO-MEJIAS, a/k/a "Tito," JOSE LUIS GUZMAN, and JAIRO CORREA-MEREJILDO, a/k/a "Cabeza,"** were not licensed federal firearms dealers as defined in Chapter 44 of Title 18, United States Code.

THE CONSPIRACY

2. Between on or about March 3, 2006, and on or about March 8, 2007, in the Eastern District of Pennsylvania, defendants

EUGENIO SANTIAGO-MEJIAS,
 a/k/a "Tito,"
 JOSE LUIS GUZMAN, and
 JAIRO CORREA-MEREJILDO,
 a/k/a "Cabeza,"

conspired and agreed together, and with other persons known and unknown to the grand jury, to willfully and unlawfully engage in the business of dealing in firearms, without having been licensed to do so under the provisions of Chapter 44 of Title 18, United States Code, and in the course of such business received firearms, which had been shipped in interstate commerce.

All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

MANNER AND MEANS

It was part of the conspiracy that:

3. Defendants **EUGENIO SANTIAGO-MEJIAS, JOSE LUIS GUZMAN, and JAIRO CORREA-MEREJILDO** obtained at least 22 firearms and ammunition and unlawfully resold the firearms and ammunition for which they were paid at least approximately \$12,150 in cash.

4. Defendants **EUGENIO SANTIAGO-MEJIAS, JOSE LUIS GUZMAN, and JAIRO CORREA-MEREJILDO**, arranged to resell the firearms and ammunition by calling the undercover agent on the telephone and agreeing to meet him on the street, at different residences, and a parking lot in Philadelphia.

5. Defendants **EUGENIO SANTIAGO-MEJIAS, JOSE LUIS GUZMAN, and JAIRO CORREA-MEREJILDO** negotiated the prices for the firearms they sold to the undercover agent based on the type of firearm and the difficulty in obtaining the firearms, three of which had obliterated serial numbers.

6. Between on or about March 3, 2006, and on or about September 21, 2006, defendants **EUGENIO SANTIAGO-MEJIAS, JOSE LUIS GUZMAN, and JAIRO CORREA-MEREJILDO** sold to the undercover agent at least approximately 18 of the 22 firearms within

1,000 feet of John Paul Jones Junior High School located at 2950 Memphis Street, Philadelphia, Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, defendants **EUGENIO SANTIAGO-MEJIAS, JOSE LUIS GUZMAN, and JAIRO CORREA-MEREJILDO** together, and with others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere,

The March 3, 2006 Sale

On or about March 3, 2006:

1. Defendant **EUGENIO SANTIAGO-MEJIAS** and a person #1 known to the grand jury went to 2791 Weikel Street in Philadelphia, Pennsylvania, where they met with an undercover law enforcement agent (“the undercover agent”) for the purpose of selling two firearms and ammunition to the undercover agent.

2. During this meeting, defendant **EUGENIO SANTIAGO-MEJIAS** took from his waistband a Beretta, Model 1915, .32 caliber pistol, bearing serial number 25261, and gave it to the undercover agent along with 43 rounds of .32 caliber ammunition, for which he was paid \$325.

3. During the same meeting, person #2 known to the grand jury took from his waistband a Hi-Point, Model JHP, .45 caliber pistol, bearing serial number X415803 and gave it to the undercover agent along with seven rounds of .45 caliber ammunition in exchange for \$350.

The April 12, 2006 Sale

4. On or about April 11, 2006, defendant **EUGENIO SANTIAGO-MEJIAS** telephoned the undercover agent and told him that he had two new .380 caliber firearms for sale for a total price of \$950. They agreed to meet the following day.

On or about April 12, 2006:

5. Defendant **EUGENIO SANTIAGO-MEJIAS** instructed the undercover agent to come to his residence at 2268 East Cambria Street in Philadelphia to purchase a firearm.

6. Later the same day, defendant **EUGENIO SANTIAGO-MEJIAS** met with the undercover agent inside his residence at 2268 East Cambria Street in Philadelphia, during which defendant **SANTIAGO-MEJIAS** told the undercover agent that he was able to sell new firearms still in the box.

7. Shortly afterwards, defendant **EUGENIO SANTIAGO-MEJIAS** sold the undercover agent a Beretta, Model 70S, .380 caliber pistol, bearing serial number A36247Y, loaded with seven rounds of .380 caliber ammunition for \$250.

The May 25, 2006 Sale

8. On or about May 24, 2006, defendant **EUGENIO SANTIAGO-MEJIAS** telephoned the undercover agent and told him that he had a .380 caliber pistol for sale for \$250.

On or about May 25, 2006:

9. Defendant **EUGENIO SANTIAGO-MEJIAS** met with the undercover agent at his residence at 2268 East Cambria Street in Philadelphia, where defendant **SANTIAGO-MEJIAS** sold the undercover agent a Colt, Model MK IV, Series 80, .380 caliber pistol with an obliterated serial number for \$250.

The June 12, 2006 Sale

10. On or about June 9, 2006, defendant **EUGENIO SANTIAGO-MEJIAS** telephoned the undercover agent and told him that he had a .380 caliber pistol for sale for \$450 and he would be able to give it to him the following day.

On or about June 12, 2006:

11. Defendant **EUGENIO SANTIAGO-MEJIAS** met with the undercover agent at his residence at 2268 East Cambria Street in Philadelphia, where defendant **SANTIAGO-MEJIAS** sold the undercover agent a Llama, Micro Max, .380 caliber pistol, bearing serial number 07-04-12517-99, loaded with seven rounds of Remington .380 caliber ammunition for \$450. Defendant **SANTIAGO-MEJIAS** told the undercover agent that he was working on getting him an “AK” assault rifle.

The June 20, 2006 Sale

12. On or about June 14, 2006, defendant **EUGENIO SANTIAGO-MEJIAS** telephoned the undercover agent and told him that he had a pistol and two rifles for sale, which the undercover agent agreed to purchase.

On or about June 20, 2006:

13. Defendant **EUGENIO SANTIAGO-MEJIAS** told the undercover agent that he had a .25 caliber pistol with an extra magazine for sale for \$450, a shotgun for sale for \$600, and that a friend of his had a “MAC 11” for sale for \$1,600, along with an “AK” assault rifle for sale for \$1,500.

14. Later the same day, defendant **EUGENIO SANTIAGO-MEJIAS** met with the undercover agent outside his residence at 2268 East Cambria Street and introduced the

undercover agent to defendant **JOSE LUIS GUZMAN**. Defendant **SANTIAGO-MEJIAS** entered his residence after instructing defendant **GUZMAN** to park behind the undercover agent's vehicle, after which defendant **GUZMAN** then removed a Mossberg, Model 590, 12 gauge shotgun, bearing serial number L227315, loaded with three shotgun shells from a green duffle bag and placed it in the undercover agent's vehicle.

15. Shortly afterwards, defendant **EUGENIO SANTIAGO-MEJIAS** exited his residence and entered the undercover agent's vehicle, where he sold the undercover agent: (1) a Beretta, Model 21A, .25 caliber pistol, bearing serial number BAS04493V, loaded with 22 rounds of .25 caliber ammunition; and (2) a Mossberg, Model 590, 12 gauge shotgun, bearing serial number L227315, loaded with three shotgun shells, for a total price of \$1,050.

The June 28, 2006 Sale

On or about June 28, 2006:

16. Defendant **EUGENIO SANTIAGO-MEJIAS** telephoned the undercover agent and told him that he had a "MAC 11" and a .380 pistol for sale, which the agent expressed an interest in buying.

17. Two hours later, defendant **EUGENIO SANTIAGO-MEJIAS** received a telephone call from the undercover agent and told the undercover agent that he had an "AK" assault rifle for sale.

18. Later the same day, defendants **EUGENIO SANTIAGO-MEJIAS** and **JOSE LUIS GUZMAN** met with the undercover agent outside of 2268 East Cambria Street, where defendant **GUZMAN** instructed the undercover agent to park his vehicle near a Nissan Maxima on Tulip Street. After the undercover agent parked as instructed, defendant **GUZMAN** took from the

trunk of the Nissan Maxima a cardboard box containing two firearms including: (1) a Romarm/CUGIR, Model WASR 10/68, 7.62x39 caliber rifle with obliterated serial numbers, loaded with 58 rounds of live ammunition; and (2) a SWD Inc., Model Cobray M-11, 9 millimeter pistol with obliterated serial numbers loaded with six 9 millimeter rounds of ammunition, which was concealed inside of a white t-shirt, and placed both firearms into the back seat of the undercover agent's vehicle.

19. Defendant **EUGENIO SANTIAGO-MEJIAS** then went into his residence at 2268 East Cambria Street, retrieved a blue gun box, and entered the undercover agent's vehicle, where he then sold the undercover agent a third firearm, a Bersa, Model Thunder 380, .380 caliber pistol, bearing serial number 552908, loaded with seven rounds of .380 caliber ammunition, for a total price of \$3,100 for all three firearms.

The August 10, 2006 Sale

20. On or about August 9, 2006, defendant **EUGENIO SANTIAGO-MEJIAS** telephoned the undercover agent and told him that he had a .22 caliber pistol, a .25 caliber pistol, and a .40 caliber Glock for a total price of \$1,300.

On or about August 10, 2006:

21. Defendant **EUGENIO SANTIAGO-MEJIAS** met with the undercover agent inside his residence at 2268 East Cambria Street, where he sold the undercover agent three firearms and ammunition including: (1) a Jennings, Model J22, .22 caliber pistol, bearing serial number 511079, loaded with five rounds of .22 caliber ammunition; (2) a Phoenix Arms, Model Raven, .25 caliber pistol, bearing serial number 3079771, loaded with two rounds of .25 caliber ammunition; (3) a Hi-Point, Model JCP, .40 caliber pistol, bearing serial number X717326, loaded

with nine rounds of .40 caliber ammunition; (4) one box of .22 caliber ammunition containing 49 rounds of live ammunition; and (5) one box of .22 caliber ammunition containing 45 rounds of live ammunition for a total price of \$1,300.

22. Later that afternoon, defendant **EUGENIO SANTIAGO-MEJIAS** telephoned the undercover agent and told him that he had a 12 gauge shotgun and a bullet proof vest for \$900 and a 9 millimeter pistol for \$500.

The August 15, 2006 Sale

On or about August 15, 2006:

23. Defendant **EUGENIO SANTIAGO-MEJIAS** received a telephone call from the undercover agent, who stated that he was interested in purchasing the 12 gauge shotgun, the 9 millimeter pistol, and the bullet proof vest.

24. Later that day, defendant **EUGENIO SANTIAGO-MEJIAS** called the undercover agent and informed him that he had the shotgun and the bullet proof vest for \$900, and a .22 caliber pistol and a 30-30 rifle with a scope for \$700.

25. Shortly afterwards, defendant **EUGENIO SANTIAGO-MEJIAS** met the undercover agent outside his residence and walked together to a red Honda parked on 2200 East Cambria Street, where defendant **SANTIAGO-MEJIAS** opened the trunk, removed two bags, and placed them in the undercover agent's vehicle. Inside the bag was a Mossberg, Model 500 AG, 12 gauge shotgun, bearing serial number J123711, loaded with three 12 gauge shotgun shells, and a Point Blank Armor, Inc., Model 29 QT, ballistic vest, which defendant **EUGENIO SANTIAGO-MEJIAS** sold to the undercover agent for a total price of \$1,200.

26. After the transaction, defendant **SANTIAGO-MEJIAS** and the undercover agent went into a grocery store at the corner of East Cambria and Memphis Streets, where the undercover agent was then introduced to defendant **JAIRO CORREA-MEREJILDO**.

27. While inside the grocery store, defendant **JAIRO CORREA-MEREJILDO** offered to sell the undercover agent another rifle for \$450, which the undercover agent declined to purchase. Defendant **CORREA-MEREJILDO** then sold the undercover agent a High Standard, Model Sentinel MK IV, .22 caliber revolver, bearing serial number S60940, loaded with nine rounds of .22 caliber ammunition, and a box containing twenty-two rounds of .22 caliber ammunition for \$300.

28. Defendant **JAIRO CORREA-MEREJILDO** then gave \$20 to defendant **EUGENIO SANTIAGO-MEJIAS** and told the undercover agent that he had provided defendant **SANTIAGO-MEJIAS** with the last eight firearms that the undercover agent had purchased.

The September 21, 2006 Sale

On or about September 21, 2006:

29. Defendant **EUGENIO SANTIAGO-MEJIAS** telephoned the undercover agent and stated that he had three firearms for sale including a TEC-9 pistol and could meet the undercover agent in a parking lot, located at 2491 Aramingo Avenue to make the sale.

30. Later that day, defendant **EUGENIO SANTIAGO-MEJIAS** and the undercover agent met in the parking lot at 2491 Aramingo Avenue, where defendant **SANTIAGO-MEJIAS** removed from the trunk of his vehicle the following firearms and ammunition: (1) a Mossberg, Model 500 CT, 20 gauge shotgun, bearing serial number G318806, wrapped in a black trash bag; (2) an Intratec, Model AB-10, 9 millimeter pistol with an obliterated serial number,

loaded with twenty rounds of 9 millimeter ammunition; and (3) a Harrington & Richardson, Model 733, .32 caliber revolver, bearing serial number AS100190, loaded with six rounds of .32 caliber ammunition, for which defendant **SANTIAGO-MEJIAS** was paid \$1,200.

The February 15, 2007 Sale

31. On or about February 13, 2007, defendant **EUGENIO SANTIAGO-MEJIAS** telephoned the undercover agent and informed him that he had two .32 caliber revolvers and a .357 caliber pistol for sale, which the undercover agent agreed to purchase later.

On or about February 15, 2007:

32. Defendant **EUGENIO SANTIAGO-MEJIAS** agreed to meet the undercover agent in Philadelphia to sell him the firearms.

33. Defendant **EUGENIO SANTIAGO-MEJIAS** met the undercover agent at the parking lot located at 2491 Aramingo Avenue and sold him three firearms including: (1) a Sturm & Ruger, Model P95DC, 9 millimeter pistol, bearing serial number 315-56616, loaded with six rounds of 9 millimeter ammunition; (2) a Harrington & Richardson, Model Premier, .32 caliber revolver, bearing serial number 386815, loaded with four rounds of .32 caliber ammunition; and (3) an Iver Johnson, .32 caliber revolver, bearing serial number A433, loaded with two rounds of .32 caliber ammunition, for the agreed upon price of \$1,650.

The March 8, 2007 Sale

On or about March 8, 2007:

34. Defendant **EUGENIO SANTIAGO-MEJIAS** telephoned the undercover agent and informed him that he had a 9 millimeter pistol for sale for \$550 and agreed to meet him in the parking lot located at 2491 Aramingo Avenue.

35. Later that day, defendant **EUGENIO SANTIAGO-MEJIAS** met the undercover agent in the parking lot, entered the agent's vehicle, and sold him an Intratec, Model Category 9, 9 millimeter pistol, bearing serial number 08995, loaded with four rounds of 9 millimeter ammunition for a negotiated price of \$450.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

1. Paragraphs 1, and 3 through 6, and overt acts 1 through 35 of Count One of this indictment are incorporated here.

2. Between on or about March 3, 2006, through on or about March 8, 2007, in the Eastern District of Pennsylvania, defendants

**EUGENIO SANTIAGO-MEJIAS,
a/k/a "Tito,"
JOSE LUIS GUZMAN, and
JAIRO CORREA-MEREJILDO,
a/k/a "Cabeza,"**

willfully engaged in, and aided and abetted the engaging in, the business of dealing in firearms, without being licensed to do so under the provisions of Chapter 44, Title 18 United States Code, by selling to others approximately 22 firearms, that is:

1. Hi Point, Model JHP, .45 caliber semi-automatic pistol, serial number X415803;
2. Beretta, Model 1915, .32 caliber semi-automatic pistol, serial number 25261;
3. Beretta, Model 70S, .380 caliber semi-automatic pistol, serial number A36247Y;
4. Colt, Model MK IV Series 80, .380 caliber semi-automatic pistol with obliterated serial numbers;
5. Llama, Model Micro Max, .380 caliber semi-automatic pistol, serial number 07-04-12517-99;
6. Beretta, Model 21A, .25 caliber semi-automatic pistol, serial number BAS04493V;
7. Mossberg, Model 590, 12 gauge shotgun, serial number L227315;
8. Bersa, Model Thunder 380, .380 caliber semi-automatic pistol, serial number 552908;

9. SWD, Model Cobray M-11, 9 millimeter semi-automatic pistol with obliterated serial numbers;
10. Romarm/Cugir, Model WASR 10/68, 7.62x39 caliber semi-automatic rifle, serial number PU-6726-85;
11. Hi-Point, Model JCP, .40 caliber semi-automatic pistol, serial number X717326;
12. Jennings Firearms, Model J22, .22 caliber semi-automatic pistol, serial number 511079;
13. Phoenix Arms Co., Model Raven, semi-automatic pistol, serial number 3079771;
14. High Standard, Model Sentinel MK IV, .22 caliber revolver, serial number S60940;
15. Mossberg, Model 500AG, 12 gauge shotgun, serial number J123711;
16. Intratec, Model AB-10, 9 millimeter semi-automatic pistol with obliterated serial numbers;
17. Harrington & Richardson, Model 733, .32 caliber semi-automatic pistol, serial number AS100190;
18. Mossberg, Model 500CT, 20 gauge shotgun, serial number G318806;
19. Intratec, Model Category 9, 9 millimeter semi-automatic pistol, serial number 08995;
20. Sturm & Ruger, Model P95DC, 9 millimeter semi-automatic pistol, serial number 315-56616;
21. Harrington & Richardson, Model Premier, .32 caliber revolver, serial number. 386815; and
22. Iver Johnson, .32 caliber revolver, serial number A433.

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

On or about March 3, 2006, in the Eastern District of Pennsylvania, defendant

**EUGENIO SANTIAGO-MEJIAS,
a/k/a “Tito,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Beretta, Model 1915, 9 millimeter semi-automatic pistol, serial number 25261.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

On or about April 12, 2006, in the Eastern District of Pennsylvania, defendant

**EUGENIO SANTIAGO-MEJIAS,
a/k/a “Tito,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Beretta, Model 70S, 9 millimeter semi-automatic pistol, serial number A36247Y.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

On or about May 25, 2006, in the Eastern District of Pennsylvania, defendant

**EUGENIO SANTIAGO-MEJIAS,
a/k/a “Tito,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Colt, Model MK IV Series 80, .380 caliber semi-automatic pistol with obliterated serial numbers.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT SIX

THE GRAND JURY FURTHER CHARGES:

On or about June 12, 2006, in the Eastern District of Pennsylvania, defendant

**EUGENIO SANTIAGO-MEJIAS,
a/k/a “Tito,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Llama, Model Micro Max, .380 caliber semi-automatic pistol, serial number 07-04-12517-99.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES:

On or about June 20, 2006, in the Eastern District of Pennsylvania, defendant

**EUGENIO SANTIAGO-MEJIAS,
a/k/a “Tito,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, (1) a Beretta, Model 21A, 9 millimeter semi-automatic pistol, serial number BAS04493V; and (2) a Mossberg, Model 590, 12 gauge shotgun, serial number L227315.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES:

On or about June 28, 2006, in the Eastern District of Pennsylvania, defendant

**EUGENIO SANTIAGO-MEJIAS,
a/k/a “Tito,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, (1) a Bersa, Model Thunder 380, .380 caliber semi-automatic pistol, serial number 552908; (2) a SWD, Model Cobray M-11, 9 millimeter semi-automatic pistol with obliterated serial numbers; and (3) a Romarm/CUGIR, Model WASR 10/68, 7.62 caliber rifle with obliterated serial numbers.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT NINE

THE GRAND JURY FURTHER CHARGES:

On or about August 10, 2006, in the Eastern District of Pennsylvania, defendant

**EUGENIO SANTIAGO-MEJIAS,
a/k/a “Tito,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a (1) Hi-Point, Model JCP, .40 caliber semi-automatic pistol, serial number X717326; (2) a Jennings Firearms, Model J22, .22 caliber semi-automatic pistol, serial number 511079; and (3) a Phoenix Arms Co., Model Raven, .25 caliber semi-automatic pistol, serial number 3079771.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT TEN

THE GRAND JURY FURTHER CHARGES:

On or about August 15, 2006, in the Eastern District of Pennsylvania, defendant

**EUGENIO SANTIAGO-MEJIAS,
a/k/a “Tito,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, (1) a High Standard, Model Sentinel MK IV, .22 caliber revolver, serial number S60940; and (2) a Mossberg, Model 500 AG, 12 gauge shotgun, serial number J123711.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES:

On or about September 21, 2006, in the Eastern District of Pennsylvania, defendant

**EUGENIO SANTIAGO-MEJIAS,
a/k/a “Tito,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, (1) an Intratec, Model AB-10, 9 millimeter semi-automatic pistol with obliterated serial numbers; (2) a Harrington & Richardson, Model 733, .32 caliber revolver, serial number AS100190; and (3) a Mossberg, Model 500 CT, 20 gauge shotgun, serial number G318806.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES:

On or about February 15, 2007, in the Eastern District of Pennsylvania, defendant

**EUGENIO SANTIAGO-MEJIAS,
a/k/a “Tito,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, (1) a Sturm & Ruger, Model Model P95DC, 9 millimeter semi-automatic pistol, serial number 315-56616; (2) a Harrington & Richardson, Model Premier, .32 caliber revolver, serial number 386815; and (3) a Iver Johnson, .32 caliber revolver, serial number A433.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES:

On or about March 8, 2007, in the Eastern District of Pennsylvania, defendant

**EUGENIO SANTIAGO-MEJIAS,
a/k/a “Tito,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, an Intratec, Model Category 9, 9 millimeter semi-automatic pistol, serial number 08995.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

NOTICE OF FORFEITURE (18 U.S.C. § 924(d))

As a result of the violations of Title 18, United States Code, Sections 371, 922(a)(1)(A), and 922(g)(1), set forth in Counts One, and Two through Thirteen of this indictment, defendants

**EUGENIO SANTIAGO-MEJIAS,
a/k/a “Tito,”
JOSE LUIS GUZMAN, and
JAIRO CORREA-MEREJILDO,
a/k/a “Cabeza,”**

shall forfeit to the United States of America, the firearms and ammunition involved in the commission of these offenses, including, but not limited to:

1. Hi Point, Model JHP, .45 caliber semi-automatic pistol, serial number X415803;
2. Beretta, Model 1915, .32 caliber semi-automatic pistol, serial number 25261;
3. Beretta, Model 70S, .380 caliber semi-automatic pistol, serial number A36247Y;
4. Colt, Model MK IV Series 80, .380 caliber semi-automatic pistol with obliterated serial numbers;
5. Llama, Model Micro Max, .380 caliber semi-automatic pistol, serial number 07-04-12517-99;
6. Beretta, Model 21A, .25 caliber semi-automatic pistol, serial number BAS04493V;
7. Mossberg, Model 590, 12 gauge shotgun, serial number L227315;
8. Bersa, Model Thunder 380, .380 caliber semi-automatic pistol, serial number 552908;
9. SWD, Model Cobray M-11, 9 millimeter semi-automatic pistol with obliterated serial numbers;
10. Romarm/Cugir, Model WASR 10/68, 7.62x39 caliber semi-automatic rifle, serial number PU-6726-85;

11. Hi-Point, Model JCP, .40 caliber semi-automatic pistol, serial number X717326;
12. Jennings Firearms, Model J22, .22 caliber semi-automatic pistol, serial number 511079;
13. Phoenix Arms Co., Model Raven, semi-automatic pistol, serial number 3079771;
14. High Standard, Model Sentinel MK IV, .22 caliber revolver, serial number S60940;
15. Mossberg, Model 500AG, 12 gauge shotgun, serial number J123711;
16. Intratec, Model AB-10, 9 millimeter semi-automatic pistol with obliterated serial numbers;
17. Harrington & Richardson, Model 733, .32 caliber semi-automatic pistol, serial number AS100190;
18. Mossberg, Model 500CT, 20 gauge shotgun, serial number G318806;
19. Intratec, Model Category 9, 9 millimeter semi-automatic pistol, serial number 08995;
20. Sturm & Ruger, Model P95DC, 9 millimeter semi-automatic pistol, serial number 315-56616;
21. Harrington & Richardson, Model Premier, .32 caliber revolver, serial number 386815; and

22. Iver Johnson, .32 caliber revolver, serial number A433.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney